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Attorneys for Plaintiffs,

TONY CLARK and PAMELA ELY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TONY CLARK and PAMELA ELY,

Plaintiffs,

v.

**FORD MOTOR COMPANY, a
Delaware corporation; DOES 1
through 10, inclusive**

Defendants.

**Case No.: 2:22-cv-03069-SVW-
GJS**

(Removed from Superior Court of
California, County of Los Angeles,
Case No. 22STCV11319)

**DECLARATION OF PHIL A
THOMAS IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR
REMAND TO SUPERIOR
COURT OF CALIFORNIA**

*Assigned for All Purposes to the
Honorable **Stephen V. Wilson***

Date: July 11, 2022

Time: 1:30 p.m.

Courtroom: 10A

Action Filed: April 1, 2022

1 I, Phil A Thomas, declare as follows:

2 1. I am an attorney admitted to practice before the United States District
3 Court for the Central District of California. I am an attorney at Knight Law Group,
4 LLP, and counsel of record for Plaintiffs Tony Clark and Pamela Ely (“Plaintiffs”)
5 in the above-captioned matter.

6 2. I have personal knowledge of the facts set forth herein and could testify
7 competently if called upon to do so.

8 3. In the matter of *Chavez v. Ford Motor Company*, No. 2:20-cv-08508-
9 MCS-PVC (C.D. Cal. 2021), attorneys’ fees, costs and expenses settled in the
10 amount of \$2,500. My office defended the plaintiff’s deposition and conducted six
11 depositions of Ford dealership personnel, and propounded and responded to written
12 discovery interrogatories and requests. There was also an in-person inspection of the
13 plaintiff’s vehicle attended by the parties’ attorneys and experts. Attached as **Exhibit**
14 **A** is a true and correct copy of executed Rule 68 offer wherein my office agreed to
15 accept fees, costs and expenses in the amount of just \$2,500.

16 4. In the matter of *Arriaga v. FCA US, LLC*, No. PSC2004169, Riverside
17 County (2021), attorneys’ fees, costs and expenses settled in the amount of \$7,500.
18 Attached as **Exhibit B** is a true and correct copy of the stipulation for attorneys’ fees,
19 costs and expenses filed in this action.

20 5. In the matter of *Velasquez v. FCA US, LLC*, No. 2:21-cv-05092-JFW-
21 AGR (C.D. Cal. 2021), attorneys’ fees, costs and expenses settled in the amount of
22 \$8,250. Attached as **Exhibit C** is a true and correct copy of the stipulation for
23 attorneys’ fees, costs and expenses filed with the Court in this action.

24 6. In the matter of *Luna v. FCA US, LLC*, No. 2:21-cv-07140-AB (JPRx)
25 (C.D. Cal. 2021), attorneys’ fees, costs and expenses settled in the amount of \$4,500.
26 Attached as **Exhibit D** is a true and correct copy of the stipulation for attorneys’
27 fees, costs and expenses filed with the Court in this action.

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